



# United States Department of the Interior

NATIONAL PARK SERVICE  
Lewis & Clark National Historic Trail  
601 Riverfront Drive  
Omaha, NE 68102-4226



OFFICIAL CORRESPONDENCE SENT VIA ELECTRONIC MAIL

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November 17, 2016

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Mr. Alex Dachs  
Planner  
Cascade County Planning Division  
121 4th Street North #2H-2I  
Great Falls, MT 59401

Dear Mr. Alex Dachs:

The National Park Service (NPS) appreciates the opportunity to provide input regarding the proposed Portage Solar Project, located in Great Falls, Montana near the boundary of the Great Falls Portage National Historic Landmark (NHL), which incorporates segments of the Lewis and Clark National Historic Trail. In May 2008, the National Trust for Historic Preservation included the site on their list of America's Most Endangered Places. The NPS generally supports renewable energy projects when such projects can be constructed and operated in an environmentally responsible manner that serves the public interest, protects natural resources, and protects our treasured landscapes. Our goal is to work with land owners, developers, and state and local government to provide expertise and practical and specific feedback in order to help facilitate smart development and best protect these important trust resources. We would like to continue the dialogue regarding visual resources and construction activities.

We appreciate the landowner's continued commitment to the NHL as an important part of our American heritage. The land owner, through the Bureau of Land Management's "Undaunted Stewardship" program, previously developed a scenic overlook of the NHL with interpretative signs so that members of the public can have access to and experience this area. We would like to ensure that the view from this overlook is protected as much as is feasible. Our experts have reviewed the materials provided thus far by the project proponent, Cypress Creek Renewables. The visual simulations appear to show adequate screening of the facility from along 13th Street South and from the intersection of 13th Street South and 33rd Avenue South.

We recommend the company consider developing an additional visual simulation from the NHL overlook to identify if areas of the project may be visible from this point. It is our understanding the natural topography may block some of the project from view. If areas are visible, it may be feasible to adjust the project layout to eliminate visible areas, or to extend/redesign the visual screening in some places to retain the existing character of the landscape from the overlook. The NPS would appreciate being able to

provide input on the type of vegetation proposed for screening, and may have recommendations as to native species that will accomplish the goal while maintaining the character of the surrounding landscape.

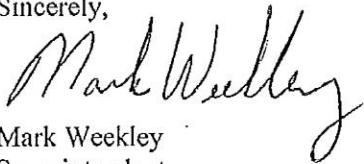
In addition to the panels, photovoltaic solar projects have other constructed components such as posts, security fencing, and inverter housing. The NPS recommends considering the use of non-reflective paint on project components to reduce the potential for glare. If portions of the security fencing will be visible, the NPS would appreciate being able to provide input on the design and finishes of the security fencing.

Fencing that is appropriately designed and has a low level of contrast with the existing forms and colors of the landscape should not affect the view shed of the Landmark. Finally, if the facility will have nighttime security lighting, the NPS recommends the project utilize shielded directional lighting fixtures that are pointed downward, thereby avoiding illumination to adjacent natural areas and the night sky.

It is our understanding the developers will need to create a temporary construction laydown area outside of the project footprint, some of which may be located within the boundaries of the NHL. The NPS recommends they locate the laydown area where it will be least obtrusive from the scenic overlook. Moreover, the NPS recommends the laydown area be fully restored with native vegetation, and would appreciate the opportunity to review any restoration plan and offer its expertise on vegetation restoration best practices.

The NPS looks forward to working with the landowner, developer, and Zoning Board of Adjustment to help ensure this project is designed and constructed in a manner least obtrusive to the natural and scenic landscape and community. Thank you for the opportunity to comment on the proposed Portage Solar Project. If you have any questions regarding our comments or about the Lewis and Clark National Historic Trail, please contact Chief of Resources Stewardship, Dan Wiley at 402-661-1830 or [dan\\_wiley@nps.gov](mailto:dan_wiley@nps.gov).

Sincerely,



Mark Weekley  
Superintendent